

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
AT KANSAS CITY**

IN RE:)	
)	
INTERSTATE UNDERGROUND WAREHOUSE)	Case No. 21-40834-DRD
AND INDUSTRIAL PARK, INC.)	Chapter 11
)	
_____ Debtor.)	

**OBJECTION TO CONFIRMATION OF
THIRD AMENDED PLAN OF REORGANIZATION**

COMES NOW, Creditor, CCC Capital, Inc. by and through counsel, Colin N. Gotham of Evans & Mullinix, P.A., and for its Objection to Confirmation of Debtor's Third Amended Plan of Reorganization states as follows:

1. Debtor filed its case on July 1, 2021 and filed its Third Amended Plan of Reorganization [#423] on May 2, 2022.
2. Interested party, Timothy Wahl, filed a Response to Debtor's Third Amended Plan of Reorganization [#431] on May 13, 2022.
3. If Debtor's Third Amended Plan of Reorganization is confirmed Creditor estimates that it will receive approximately \$62,265.00 of its \$150,000.00 claim, provided the claims of all Class 14 Creditors are disallowed. Allowance of any of the claims of any of the Class 14 Creditors will reduce the disbursements to all Class 13 Creditors.
4. Debtor is proposing to make disbursements to Class 13 Creditors over a five (5) year period.
5. If Timothy Wahl's proposal is accepted or implemented Creditor estimates that it will receive approximately 100% of its \$150,000.00 claim, provided the claims of all Class 14 Creditors are disallowed. Further, the disbursement of funds will allow Creditor to receive funds in a much timelier manner than is currently proposed.
6. Creditor believes that if Timothy Wahl's proposal is not accepted or implemented the Debtor should be required to increase the proposed disbursement to Class 13 Creditors to \$725,000.00.
7. Based on the pleadings filed by Timothy Wahl, the Debtor is not paying the liquidation value pursuant to 11 U.S.C. § 1129(a)(7).

WHEREFORE, Creditor, CCC Capital, Inc. prays that this Court deny Confirmation of Debtor's Third Amended Plan of Reorganization and for such other and further relief as is just and equitable.

Respectfully Submitted:

EVANS & MULLINIX, P.A.

/s/ Colin N. Gotham

Colin N. Gotham, KS #19538; MO #52343

7225 Renner Road, Suite 200

Shawnee, KS 66217

(913) 962-8700; (913) 962-8701 (Fax)

cgotham@emlawkc.com

Attorneys For Creditor, CCC Capital, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May 2022, a true and correct copy of the foregoing was electronically filed with the court using the CM/ECF system which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Colin N. Gotham

Colin N. Gotham